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Attorneys for ROE CL Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

This Document Relates to:

*Jane Roe CL 5 v. Uber Technologies,
Inc., et al., No. 3:23-cv-05647-CRB*

*Jane Roe CL 14 v. Uber Technologies,
Inc., et al., No. 3:24-cv-04680-CRB*

*Jane Roe CL 32 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05596-CRB*

*Jane Roe CL 36 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05720-CRB*

*Jane Roe CL 40 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05734-CRB*

*Jane Roe CL 42 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05740-CRB*

*Jane Roe CL 43 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05741-CRB*

*Jane Roe CL 45 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05746-CRB*

*Jane Roe CL 48 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05810-CRB*

**ATTORNEY JENNIFER S. DOMER'S
DECLARATION IN SUPPORT OF
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS CASES FOR
FAILURE TO COMPLY WITH PTO 31**

Date: January 16, 2026
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

1 *Jane Roe CL 49 v. Uber Technologies,*
2 *Inc., et al., No. 3:24-cv-05811-CRB*

3 *Jane Roe CL 53 v. Uber Technologies,*
4 *Inc., et al., No. 3:24-cv-05831-CRB*

5 *Jane Roe CL 58 v. Uber Technologies,*
6 *Inc., et al., No. 3:24-cv-05846-CRB*

7 *Jane Roe CL 61 v. Uber Technologies,*
8 *Inc., et al., No. 3:24-cv-05850-CRB*

9 *Jane Roe CL 64 v. Uber Technologies,*
10 *Inc., et al., No. 3:24-cv-06188-CRB*

11 *Jane Roe CL 70 v. Uber Technologies,*
12 *Inc., et al., No. 3:24-cv-06863-CRB*

13 *Jane Roe CL 76 v. Uber Technologies,*
14 *Inc., et al., No. 3:24-cv-07569-CRB*

15 *Jane Roe CL 78 v. Uber Technologies,*
16 *Inc., et al., No. 3:24-cv-07584-CRB*

17 *Jane Roe CL 82 v. Uber Technologies,*
18 *Inc., et al., No. 3:24-cv-08522-CRB*

19 *Jane Roe CL 84 v. Uber Technologies,*
20 *Inc., et al., No. 3:24-cv-08526-CRB*

21 *Jane Roe CL 86 v. Uber Technologies,*
22 *Inc., et al., No. 3:24-cv-08756-CRB*

23 *Jane Roe CL 93 v. Uber Technologies,*
24 *Inc., et al., No. 3:24-cv-09549-CRB*

25 *Jane Roe CL 105 v. Uber Technologies,*
26 *Inc., et al., No. 3:25-cv-01349-CRB*

27 *Jane Roe CL 115 v. Uber Technologies,*
28 *Inc., et al., No. 3:25-cv-01943-CRB*

Jane Roe CL 121 v. Uber Technologies,
Inc., et al., No. 3:25-cv-02136-CRB

Jane Roe CL 123 v. Uber Technologies,
Inc., et al., No. 3:25-cv-02139-CRB

Jane Roe CL 138 v. Uber Technologies,
Inc., et al., No. 3:25-cv-03137-CRB

Jane Roe CL 143 v. Uber Technologies,
Inc., et al., No. 3:25-cv-03260-CRB

Jane Roe CL 153 v. Uber Technologies, Inc., et al., No. 3:25-cv-03818-CRB

Jane Roe CL 172 v. Uber Technologies, Inc., et al., No. 3:25-cv-04708-CRB

I, Jennifer S. Domer, declare as follows:

1. I am an attorney at Cutter Law P.C. admitted to practice before the courts of the State of California. I am a Partner at Cutter Law, P.C., and am one of the counsels of record for all filed Jane Roe CL claimants. I have personal knowledge of the matters set forth herein, and if called to testify, I would testify competently as to the information below.

2. This declaration is made in support of the Opposition to Defendants' Motion to Dismiss.

3. Counsel's firm has made extensive efforts to reach clients listed as Exhibit A, subject to Defendants' Motion to Dismiss.

4. Those efforts include extensive phone calls, text messages, emails, physical mailings to last known address, and additional address searches in databases. Counsel has also employed a private investigator to help locate these individuals. Through the database searches and private investigators, Counsel also attempted to reach potential relatives in an effort to reach the Plaintiffs.

5. Counsel produced the PTO 31 statements for Jane Roe CL 5 and 64 on December 4, 2025.

6. Counsel produced the PTO 31 statement for Jane Roe CL 32 and 93 on December 5, 2025.

7. Counsel uploaded an Amended Ride Information Form with new information to help locate the receipt for Jane Roe CL 14 on June 9, 2025, and did not receive a response as to success or attempt of a search of the new information provided.

8. Counsel uploaded an Amended Ride Information Form with new information to help locate the receipt for Jane Roe CL 32 on August 28, 2025, and did not receive a response as to success or attempt of a search of the new information provided.

Attorney for Jane Roe CL Plaintiffs